

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No. 19-34574-KRH

Chapter 7

**PROPOSED AGENDA FOR HEARING ON
FEBRUARY 17, 2022, AT 1:00 P.M. (PREVAILING EASTERN TIME)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, United States Courthouse, 701 East Broad Street, Richmond, Virginia 23219, on February 17, 2022, beginning at 1:00 p.m. via Zoom:

Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJIsfu6gpzMrHRBE47YWERHgxP8vk2BVTdI>

Listen-only conference line:

Dial: 1-866-590-5055

Access Code: 4377075

Security Code: 21722

I. MATTERS IN THE MAIN CASE

1. Motion to Approve - *TRUSTEES MOTION FOR AN ORDER APPROVING (I) THE TRUSTEES RELIANCE ON DEBTORS LIST OF EQUITY SECURITY HOLDERS AND (II) PROCEDURES FOR OBTAINING COPIES OF FILED TAX RETURNS AND MEMORANDUM IN SUPPORT THEREOF* filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Attachments: # (1) Exhibit(s) B through D) (Beran, Paula) [ECF No. 1086]

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

Paula S. Beran, Esquire (Va. Bar No. 34679)
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
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Telephone: (804) 783-8300
Telecopy: (804) 783-0178

Counsel for Lynn L. Tavenner, Chapter 7 Trustee

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s)[1086](#) Motion to Approve filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 11/16/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Beran, Paula) [ECF No. 1087]
- b. Hearing held and continued; Appearance(s): Paula Beran for Trustee (Re: related document(s)[1086](#) Motion to Approve filed by Lynn L. Tavenner) Hearing scheduled for 12/21/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) [ECF No. 1102]
- c. Exhibit - *Schedule A* (Re: related document(s)[1086](#) Motion to Approve filed by Lynn L. Tavenner, [1087](#) Notice of Motion and Notice of Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 1156]
- d. Hearing held and continued; Declaration of Lynn L. Tavenner, entry [1159](#) Admitted. Appearance(s): Paula Beran for Trustee (Re: related document(s)[1086](#) Motion to Approve filed by Lynn L. Tavenner) Hearing scheduled for 1/27/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) **Modified** on 12/21/2021 to edit text (Gary, Lisa) [ECF No. 1161]
- e. Hearing continued; Appearance(s): Paula Beran for Trustee (Re: related document(s)[1086](#) Motion to Approve filed by Lynn L. Tavenner) Hearing scheduled for 2/17/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) [ECF No. 1200]
- f. Motion to Amend (Related Document(s)[79](#) List of Equity Security Holders Filed filed by LeClairRyan PLLC) filed by Andrew M. Bowman of Gentry Locke on behalf of Gary D. LeClair. (Attachments: # [1](#) Proposed Order # [2](#) Exhibit(s) 2 # [3](#) Exhibit(s) 3 # [4](#) Exhibit(s) 4 # [5](#) Exhibit(s) 5 # [6](#) Exhibit(s) 6 # [7](#) Exhibit(s) 7 # [8](#) Exhibit(s) 8) (Bowman, Andrew) [ECF No. 1217]

Response Deadline: November 13, 2021

Responses Filed: Objection to Trustee's Motion to Approve (Re: related document(s)[1086](#) Motion to Approve filed by Lynn L. Tavenner) filed by Andrew M. Bowman of Gentry Locke on behalf of Gary D. LeClair. (Attachments: # (1) Exhibit(s) 1 # (2) Exhibit(s) 2 # (3) Exhibit(s) 3 # (4) Exhibit(s) 4 # (5) Exhibit(s) 5 # (6) Exhibit(s) 6) (Bowman, Andrew) [ECF No. 1092]

Objection to Rodney K. Adams, John T. Jessee, Paul C. Kuhnel, and Andrew K. Clark's Limited Objection to Trustee's Motion for an Order Approving (I) The Trustee's Reliance on Debtor's List of Equity Security Holders and (II) Procedures for Obtaining Copies of Filed Tax Returns and Memorandum in Support Thereof (Re: related document(s)[1086] Motion to Approve filed by Lynn L. Tavenner) filed by Michael E. Hastings of Woods Rogers PLC on behalf of Rodney K. Adams, John T. Jessee, Paul C. Kuhnel, and Andrew K. Clark. (Hastings, Michael) [ECF No. 1093]

Objection to Trustees Motion for an Order Approving (I) The Trustees Reliance on Debtors List of Equity Security Holders (II) Procedures for Obtaining Copies of Filed Tax Returns (Re: related document(s)[1086] Motion to Approve filed by Lynn L. Tavenner) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Elizabeth Acee. (Attachments: # (1) Exhibit(s) Exhibit A # (2) Exhibit(s) Exhibit B # (3) Exhibit(s) Exhibit C) (McGraw, Diana Lyn) [ECF No. 1094]

Objection to Trustees Motion for an Order Approving (I) The Trustees Reliance on Debtors List of Equity Security Holders (II) Procedures for Obtaining Copies of Filed Tax Returns (Re: related document(s)[1086] Motion to Approve filed by Lynn L. Tavenner) filed by Diana Lyn Curtis McGraw of Fox Rothschild LLP on behalf of Richard W. Bowerman, Paul Burleigh, Karol Corbin Walker, Mark Dombroff, Niclas Ferland, Janice Grubin, Charles Erik Gustafson, Christopher J. Lange, Jason Medley, Lori Thompson. (Attachments: # (1) Exhibit(s) # (2) Exhibit(s) # (3) Exhibit(s)) (McGraw, Diana Lyn) [ECF No. 1095]

Objection Joinder To Various Objections (Re: related document(s)[1086] Motion to Approve filed by Lynn L. Tavenner) filed by Christopher L. Perkins of Eckert Seamans Cherin & Mellott, LLC on behalf of Certain Former Attorneys. (Perkins, Christopher) [ECF No. 1100]

Status:

The Trustee is prepared to move forward and request that the Court enter an order, in the form attached hereto as Exhibit A, (a) approving the Masked Tax Return Copy Procedures aspect of the Motion and (b) continuing other aspects of the Motion until March 29, 2022 at 11:00 a.m.

2. Motion to Authorize --*TRUSTEES MOTION FOR AN ORDER AUTHORIZING PAYMENT OF REASONABLE AND NECESSARY ADMINISTRATIVE EXPENSES IN EXCESS OF CAP FOUND AT LOCAL BANKRUPTCY RULE 2016-2 AND MEMORANDUM IN SUPPORT THEREOF* filed by Paula S. Beran on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 1201]

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s) [1201](#) Motion to Authorize filed by Lynn L. Tavenner) filed by Paula S. Beran on behalf of Lynn L. Tavenner. Hearing scheduled for 2/17/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Beran, Paula) [ECF No. 1202]

Response Deadline: February 10, 2022

Responses Filed: None

Status: The Trustee will request that the Court enter an order (a) authorizing and approving the payment of the Deposition Invoices and (b) granting such other and further relief as the Court may deem proper.

II. MATTERS IN ADVERSARY PROCEEDINGS

3. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) - Motion for Summary Judgment filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (McKee, Thomas) [ECF No. 133]

Related documents:

- a. Joint Stipulation *for Dismissal of Defendant Gary LeClair* By Lynn L. Tavenner, as Chapter 7 Trustee and Between filed by Brittany Jane Nelson of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Nelson, Brittany) [ECF No. 130]
- b. Notice of Hearing (Re: related document(s) [133](#) Motion for Summary Judgment filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. Hearing scheduled for 2/17/2022 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McKee, Thomas) [ECF No. 134]

- c. Motion to File Document(s) Under Seal (Re: related document(s)[133](#) Motion for Summary Judgment filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (Attachments: # [1](#) Proposed Order) (McKee, Thomas) [ECF No. 135]
- d. Notice of Hearing (Re: related document(s)[135](#) Motion to File Documents(s) Under Seal filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. Hearing scheduled for 2/17/2022 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McKee, Thomas) [ECF No. 136]
- e. Sealed Motion/Application(Re: related document(s)[133](#) Motion for Summary Judgment filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (Attachments: # [1](#) Statement of Undisputed Material Facts # [2](#) Deposition Tabs # [3](#) Exhibit(s) 1 # [4](#) Exhibit(s) 2 # [5](#) Exhibit(s) 3 # [6](#) Exhibit(s) 4 # [7](#) Exhibit(s) 5 # [8](#) Exhibit(s) 6 # [9](#) Exhibit(s) 7 # [10](#) Exhibit(s) 8 # [11](#) Exhibit(s) 9 # [12](#) Exhibit(s) 10 # [13](#) Exhibit(s) 11 # [14](#) Exhibit(s) 12 # [15](#) Exhibit(s) 13 # [16](#) Exhibit(s) 14 # [17](#) Exhibit(s) 15 # [18](#) Exhibit(s) 16 # [19](#) Exhibit(s) 17 # [20](#) Exhibit(s) 18 # [21](#) Exhibit(s) 19 # [22](#) Exhibit(s) 20 # [23](#) Exhibit(s) 21 # [24](#) Exhibit(s) 22 # [25](#) Exhibit(s) 23 # [26](#) Exhibit(s) 24 # [27](#) Exhibit(s) 25 # [28](#) Exhibit(s) 26 # [29](#) Exhibit(s) 27 # [30](#) Exhibit(s) 28 # [31](#) Exhibit(s) 29 # [32](#) Exhibit(s) 30 # [33](#) Exhibit(s) 31 # [34](#) Exhibit(s) 32 # [35](#) Exhibit(s) 33 # [36](#) Exhibit(s) 34 # [37](#) Exhibit(s) 35 # [38](#) Exhibit(s) 36 # [39](#) Exhibit(s) 37 # [40](#) Exhibit(s) 38 # [41](#) Exhibit(s) 39 # [42](#) Exhibit(s) 40 # [43](#) Exhibit(s) 41 # [44](#) Exhibit(s) 42 # [45](#) Exhibit(s) 43 # [46](#) Exhibit(s) 44 # [47](#) Exhibit(s) 45 # [48](#) Exhibit(s) 46 # [49](#) Exhibit(s) 47 # [50](#) Exhibit(s) 48 # [51](#) Exhibit(s) 49 # [52](#) Exhibit(s) 50 # [53](#) Exhibit(s) 51 # [54](#) Exhibit(s) 52 # [55](#) Exhibit(s) 53 # [56](#) Exhibit(s) 54 # [57](#) Exhibit(s) 55 # [58](#) Exhibit(s) 56 # [59](#) Exhibit(s) 57 # [60](#) Exhibit(s) 58 # [61](#) Exhibit(s) 59 # [62](#) Exhibit(s) 60) (McKee, Thomas) [ECF No. 137]
- f. Amended Notice of Hearing (Re: related document(s)[133](#) Motion for Summary Judgment filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. Hearing scheduled for 2/17/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McKee, Thomas) [ECF No. 138]
- g. Amended Notice of Hearing (Re: related document(s)[135](#) Motion to File Documents(s) Under Seal filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on

behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. Hearing scheduled for 2/17/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McKee, Thomas) [ECF No. 139]

- h. Fourth Stipulation and Amended Pre-Trial Order; (Re: related document(s)[100] Pre-Trial Order) Trial set for 4/18/2022 through 4/29/2022 at 10:00 AM at Judge Huennekens', 701 E. Broad St., Rm. 5000, Richmond, Virginia. A hearing on any dispositive Motions including summary judgment motions shall be held on March 15, 2022 at 11:00 a.m. at Judge Huennekens', 701 E. Broad St., Rm. 5000, Richmond, Virginia A hearing on the motion to amend shall be March 8, 2022 at 11:00 a.m. at Judge Huennekens', 701 E. Broad St., Rm. 5000, Richmond, Virginia (Bullock, Nathaniel) [ECF No. 144]

Response Deadline: February 11, 2022

Responses Filed: Sealed Answer/Response/Reply (Re: related document(s)[137] Sealed Document filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Morabito, Erika) [ECF No. 150]

Corrected Sealed Answer/Response/Reply (Re: related document(s)[137] Sealed Document filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC, [150] Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Morabito, Erika) [ECF No. 152]

Sealed Exhibit (Re: related document(s)[152] Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Morabito, Erika) [ECF No. 153]

Motion to File Document(s) Under Seal (Re: related document(s)[150] Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee, [152] Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee, [153] Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L.

Tavanner, as Chapter 7 Trustee. (Morabito, Erika) [ECF No. 154]

Notice of Hearing (Re: related document(s)[154] Motion to File Documents(s) Under Seal filed by Lynn L. Tavanner, as Chapter 7 Trustee, Lynn L. Tavanner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavanner, as Chapter 7 Trustee. Hearing scheduled for 3/15/2022 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Morabito, Erika) [ECF No. 155]

Status: Pursuant to the Fourth Stipulation and Amended Pre-Trial Order, the hearing on the Motion for Summary Judgment has been continued until March 15, 2022, at 11:00 a.m.; as such, the parties also respectfully request that the related Motion to Seal be continued until March 15, 2022, at 11:00 a.m.

REPORTS

4. Case Status and Report pursuant to Local Rule 2015-(a)-(1)(A)

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: February 15, 2022
Richmond, Virginia

By: /s/ Paula S. Beran
Paula S. Beran, Esquire (VSB No. 34679)
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Telecopier: (804) 783-0178

Counsel for Lynn L. Tavanner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court and applicable orders, I certify that on this 15th day of February 2022, a true copy of the foregoing Agenda was sent electronically to all parties receiving ECF notices in this Case.

/s/ Paula S. Beran
Counsel for Lynn L. Tavenner, Chapter 7 Trustee

Exhibit A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No.

19-34574-KRH

Chapter 7

**ORDER APPROVING PROCEDURES FOR
OBTAINING COPIES OF FILED TAX RETURNS**

This matter coming before the Court on the Trustee's Motion For An Order Approving (I) The Trustee's Reliance On Debtor's List of Equity Security Holders And (II) Procedures For Obtaining Copies Of Filed Tax Returns And Memorandum In Support Thereof (the "**Motion**")² filed by Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee (in such capacity, the "**Chapter 7 Trustee**" and/or the "**Trustee**") of the bankruptcy estate (the "**Estate**") of LeClairRyan PLLC ("**LeClairRyan**" and/or the "**Debtor**") seeking, *inter alia*, (a) an order (1) approving the Trustee's continued reliance on Debtor's ESH List and (2) approving procedures to obtain masked copies of the Debtor's tax returns; and (b) other and further relief as the Court may deem proper, as well as Objection to Trustee's Motion to Approve filed on behalf of Gary D. LeClair

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

[ECF No. 1092], Rodney K. Adams, John T. Jessee, Paul C. Kuhnel, and Andrew K. Clark's Limited Objection to Trustee's Motion for an Order Approving (I) The Trustee's Reliance on Debtor's List of Equity Security Holders and (II) Procedures for Obtaining Copies of Filed Tax Returns and Memorandum in Support Thereof [ECF No. 1093], Objection to Trustees Motion for an Order Approving (I) The Trustees Reliance on Debtors List of Equity Security Holders (II) Procedures for Obtaining Copies of Filed Tax Returns filed on behalf of Elizabeth Acee. [ECF No. 1094], Objection to Trustees Motion for an Order Approving (I) The Trustees Reliance on Debtors List of Equity Security Holders (II) Procedures for Obtaining Copies of Filed Tax Returns filed on behalf of Richard W. Bowerman, Paul Burleigh, Karol Corbin Walker, Mark Dombroff, Niclas Ferland, Janice Grubin, Charles Erik Gustafson, Christopher J. Lange, Jason Medley, Lori Thompson [ECF No. 1095], and Objection Joinder To Various Objections filed by Christopher L. Perkins on behalf of Certain Former Attorneys [ECF No. 1100] (collectively, the “**Objections**”); and upon consideration of the Masked Tax Return Copy Procedures aspect of the Motion, the Court having reviewed the Masked Tax Return Copy Procedures aspect of the Motion and having heard the statements of counsel in support of the relief requested in the Masked Tax Return Copy Procedures of the Motion at a hearing before the Court (the “**Hearing**”); the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (c) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and (d) notice of the Motion (and service of the proposed order) was sufficient under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief herein granted.

NOW, THEREFORE, it is **ORDERED**, that:

1. The Masked Tax Return Copy Procedures aspect of the Motion are approved and authorized as modified herein.

2. The Non-Disclosure and Indemnification Agreement found at Exhibit D to the Motion shall be modified as follows:

A. Paragraph 1 shall be deleted in its entirety and replaced with the following: “For purposes of preparing one or more of her/his personal tax returns, any amendment thereto, or in connection with any audit (the “**Personal Filing**”), Recipient has requested from the Estate a copy of the Debtor’s _____ Tax Return (“**Requested Tax Return**”) that contains confidential financial and/or personally identifiable information (collectively referred to as the “**Confidential Information**”). Recipient acknowledges that she/he will be furnished with a masked copy of the Debtor’s Requested Tax Return for the specific and sole use in connection with the Personal Filing. Recipient agrees not to utilize or disclose to anyone the content of the Requested Tax Return and/or its Confidential Information other than in connection with the preparation of his/her Personal Filing.”

B. Paragraph 3 shall be deleted in its entirety and replaced with the following: “Recipient also acknowledges that disclosure or use of the Requested Tax Return and its Confidential Information, except as provided in this Agreement, may cause serious harm or damage to the Estate and/or other persons. Therefore, Recipient agrees that she/he will not use Requested Tax Return and/or its Confidential Information for any purpose other than as stated in Paragraph 1, above. The Recipient further agrees that she/he will not, either directly or indirectly by agent, employee, representative, or sub-contractors/suppliers, disclose the Requested Tax Return and/or its Confidential Information, either in whole or in part, to any

third party; provided, however that the Requested Tax Return and its Confidential Information may be disclosed to Recipient's accountant, and/or tax advisor, and/or tax lawyer in connection with the preparation of the Recipient's Personal Filing. The Recipient further agrees to inform any accountant, and/or tax advisor, and/or tax lawyer who receives the Requested Tax Return and its Confidential Information of the confidential nature of such information, and will be directed by Recipient to treat such information confidentially, and consistent with the terms of this Agreement."

3. All other aspects of the Motion are continued for hearing on March 29, 2022 at 11:00 a.m.

4. This Court retains jurisdiction to interpret, implement, and enforce the provisions of this Order.

5. As permitted by Bankruptcy Rule 6004(h), notwithstanding Bankruptcy Rule 7062, this Order shall be effective and enforceable immediately upon entry.

6. Upon entry, the Clerk shall forthwith provide a copy of this Order to counsel for the Trustee, who shall serve (by electronic delivery, first class mail, postage prepaid or overnight delivery) copies of this Order on: the Office of the United States Trustee and the individuals listed on the Debtor's ESH List.

ENTERED:

UNITED STATES BANKRUPTCY JUDGE

I ask for this:

/s/

Paula S. Beran, Esquire (VSB No. 34679)
PBeran@TB-LawFirm.com
Tavener & Beran, PLC
20 North 8th Street, Second Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Facsimile: (804) 783-0178

Counsel for Lynn L. Tavenner, Chapter 7 Trustee

Seen and No Objection

/s/

Shannon F. Pecoraro, Esquire
Office of the U.S. Trustee
701 East Broad Street, Suite 4304
Richmond, VA 23219

Trial Attorney

CERTIFICATION

I hereby certify that, pursuant to Local Rule 9022-1, the foregoing proposed Order has either been endorsed by and/or served upon all necessary parties.

Counsel

Service List for Entered Order

Paula S. Beran, Esquire
Tavener & Beran, PLC
20 North 8th Street, Second Floor
Richmond, Virginia 23219

Shannon F. Pecoraro, Esquire
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